RICHARD A. SMITH, WSBA 15127 1 **SMITH LAW FIRM** 2 314 No. Second Street Yakima, WA 98901 3 Telephone: 509-457-5108 4 5 Attorney for Defendant 6 Donovan Cloud 7 8 9 IN THE UNITED STATES DISTRICT COURT 10 FOR THE EASTERN DISTRICT OF WASHINGTON (Honorable Salvador Mendoza, Jr.) 11 12 UNITED STATES OF AMERICA. 13 NO. 1:19-CR-02032-SMJ-2 Plaintiff, 14 VS. 15 PROPOSED CASE MANAGEMENT **DEADLINES** 16 DONOVAN CLOUD, 17 Defendant. 18 19 20 21 TO: Clerk of U.S. District Court, Eastern District of Washington 22 TO: Thomas J. Hanlon, Assistant United States Attorney Richard Burson, Assistant United States Attorney 23 24 **COMES NOW** DONOVAN CLOUD by and through his attorney of record, 25 Richard A. Smith of Smith Law Firm, and submits his Proposed Case Management 26 Deadlines for a trial date of April 27, 2020, as follows: 27 28 /// 29 PROPOSED CASE MANAGEMENT DEADLINES **SMITH LAW FIRM** 30 - Page 1 314 North Second Street 31 Yakima, WA 98901 (509) 457-5108

PROPOSED DEADLINES	
Deadline	Date
Disclose all discovery	January 16, 2020
Alibi Notices	January 16, 2020
Rule 404(b) and 609 Notices	January 16, 2020
Rule 16 expert summaries (both parties)	January 23, 2020
All pretrial motions, including discovery motions,	February 25, 2020
Daubert motions, and motions in limine, filed	
PRETRIAL CONFERENCE	March 17, 2020
	9:30 a.m. in Yakima
CI's identities and willingness to be interviewed	April 13, 2020
disclosed to Defendant (if applicable)	
Grant jury transcripts disclosed to Defendant:	
Case Agent	April 13, 2020
CIs (if applicable)	April 13, 2020
Other Witnesses	April 13, 2020
Exhibit lists filed and emailed to the Court	April 20, 2020
Witness lists filed and emailed to the Court	April 20, 2020
Trial briefs, jury instructions, verdict forms, and	April 17, 2020
requested voir dire filed and emailed to the Court	
Exhibit binders delivered to parties and to the Cour	
Delivery of JERS-compatible digital evidence files	to April 17, 2020
the Courtroom Deputy	
Trial notices filed with the Court	April 17, 2020
Technology readiness meeting (in-person)	April 20, 2020
JURY TRIAL	April 27, 2020

Presented by:

/s/ Richard A. Smith

RICHARD A. SMITH, WSBA 15127

Attorney for Defendant Donovan Cloud

314 North Second Street

Yakima, WA 98901

rasmith@house314.com; smithone@house314.com

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on September 27, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to all parties.

/s/ Lugene M. Borba LUGENE M. BORBA Legal Assistant, Smith Law Firm

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